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[additional counsel listed below]

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

WESTERN WATERSHEDS PROJECT;)
NATIONAL PRESS PHOTOGRAPHERS)
ASSOCIATION; and NATURAL RESOURCES)
DEFENSE COUNCIL,)
Plaintiffs,)

v.)

Civil No. 15-cv-169-S

PETER K. MICHAEL, in his official capacity)
as Attorney General of Wyoming; TODD)
PARFITT, in his official capacity as Director)
of the Wyoming Department of Environmental)
Quality; PATRICK J. LEBRUN, in his official)
capacity as County Attorney of Fremont)
County, Wyoming; JOSHUA SMITH, in his)
official capacity as County Attorney of)
Lincoln County, Wyoming; CLAY KAINER,)
in his official capacity as County and)
Prosecuting Attorney of Sublette County,)
Wyoming,)
Defendants.)

JOINT MOTION TO EXTEND THE DEADLINE FOR A FEE PETITION

The Court entered a final judgment for Plaintiffs on October 29, 2018. Dkt. Nos. 113 & 114. On November 11, 2018, the parties jointly moved for an extension of the deadline for Plaintiffs to file their petition for fees and costs up to and including January 31, 2019. Dkt. No. 115. In that motion, the parties noted that they may return to the Court to seek additional time. The Court granted that motion. Dkt. No. 116. The parties now seek up to and including March 31, 2019, to either notify the court that a settlement has been reached, or for Plaintiffs to file their petition for costs and fees.

In support of this motion, the parties state as follows:

1. Plaintiffs have provided Defendants a complete accounting of their fees and costs, including details regarding the rates which they seek, and contemporaneous time sheets detailing their hours and activities.
2. Defendants have been assessing Plaintiffs' demand but have not yet responded with a settlement offer.
3. Defendants note that, after Plaintiffs provided their information, Wyoming's new Governor was sworn in on January 7, 2019. The new Governor's approval is needed before Wyoming's counsel can extend a settlement offer.
4. Defendants anticipate that they will be able to provide Plaintiffs a response to Plaintiffs' demand by February 8, 2019.
5. The parties will then require time to discuss Defendants' response and, if no settlement is reached, for Plaintiffs to prepare their costs and fee petition.

Based on the foregoing representations, the parties respectfully request that the Court extend the deadline for filing a petition for fees and costs up to and including March 31, 2019.

Submitted this 23rd day of January, 2019.

/s/ David S. Muraskin

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¹ The parties contacted Mr. Rideout but were not able to obtain his express consent prior to filing this motion. The parties previously agreed to this extension in principle.

Counsel for Defendants Patrick Lebrun and Joshua Smith

/s/ Matt Gaffney

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Counsel for Defendant Clayton Kainer

CERTIFICATE OF SERVICE

I certify that on the 23rd day of January, 2019, I electronically filed the foregoing with the Clerk of the U.S. District Court of Wyoming using the CM/ECF system which sent a notice of electronic filing to all counsel of record.

/s/ Michael E. Wall

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